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13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF ARIZONA**

15 A.P.F. on his own behalf and on behalf of his  
16 minor child, O.B.; J.V.S., on his own behalf  
and on behalf of his minor child H.Y.; J.D.G.  
17 on his own behalf and on behalf of his minor  
child, M.G.; H.P.M. on his own behalf and on  
18 behalf of his minor child, A.D.; M.C.L. on his  
own behalf and on behalf of his minor child,  
19 A.J.; and R.Z.G. on his own behalf and on  
behalf of his minor child, B.P.,

20 Plaintiffs,

21 v.

22 United States of America,

23 Defendant.

No. CV-20-00065-PHX-SRB

**NOTICE OF DEPOSITION  
UNDER FED. R. CIV. P. 30(b)(6)**

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C.M. on her own behalf and on behalf of her  
minor child, B.M.; L.G., on her own behalf  
and on behalf of her minor child, B.G.; M.R.,  
on her own behalf and on behalf of her minor  
child, J.R.; O.A., on her own behalf and on  
behalf of her minor child, L.A.; and V.C., on  
her own behalf and on behalf of her minor  
child, G.A.,

Plaintiffs,

v.

United States of America,

Defendant.

No. CV-19-05217-PHX-SRB

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs, by  
and through undersigned counsel, hereby give notice of the following deposition before  
an officer authorized by law to administer oaths:

**DEPONENT:** **U.S. Attorney's Office for the District of  
Arizona**

**PLACE OF DEPOSITION:** **Remote**

**DATE OF DEPOSITION:** **July 11, 2022 at 11:00 am ET**

The deposition shall be recorded by audiovisual and stenographic means.  
Defendant shall designate one or more of its officers, directors, agents, or other persons  
who consent to testify on its behalf about the topics set forth in the attached Exhibit A.

Plaintiffs request that Defendant provide Plaintiffs' counsel via email, no later  
than five business days prior to the deposition, with the name(s) of the person(s) who  
will testify on its behalf concerning the topics specified in the attached Exhibit A and  
the particular topics about which each named person will testify.

Respectfully submitted this 24th day of June, 2022.

OSBORN MALEDON, P.A.

By s/ Travis C. Hunt  
Travis C. Hunt  
David B. Rosenbaum

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*Attorneys for Plaintiffs A.P.F. et al.*

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**EXHIBIT A**

**DEFINITIONS**

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3 1. **AZ USAO.** The term “AZ USAO” refers to the United States Attorney’s  
4 Office for the District of Arizona and includes all offices, departments, bureaus,  
5 divisions, officials, agents, employees, entities, or contractors of the United States  
6 Attorney’s Office for the District of Arizona.  
7

8 2. **Communication.** The term “Communication” means all written, oral,  
9 telephonic or other inquiries, dialogues, discussions, conversations, interviews,  
10 correspondence, consultations, negotiations, agreements, understandings, meetings,  
11 letters, notes, telegrams, advertisements, Emails and all other Documents evidencing  
12 any verbal or nonverbal interaction between or among persons and/or entities.  
13

14 3. **Document.** The term “Document” includes all items listed in Rule  
15 34(a)(1)(A) and (B) of the Federal Rules of Civil Procedure, including any  
16 electronically stored information (including Emails) or tangible thing, however  
17 produced or reproduced, and each and every electronic source or tangible or intangible  
18 thing from which information can be processed or transcribed. “Document” shall  
19 include both hard copy and electronic documents. A draft or non-identical copy is a  
20 separate Document within the meaning of this term.  
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23 4. **Email.** The term “Email” means any message found in an Email  
24 repository, including, but not limited to, Outlook PST and Lotus NSF.

25 5. **Plaintiffs.** The term “Plaintiff(s)” refers to the named Plaintiffs in *A.P.F.,*  
26 *et al. v. United States*, Case No. CV-20-00065-PHX-SRB (D. Ariz.), and *C.M., et al. v.*  
27 *United States*, Case No. CV-19-052170-PHX-SRB (D. Ariz.).  
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1           4.     The connectives “and” and “or” shall be construed either disjunctively or  
2 conjunctively as necessary to bring within the scope of the request all responses that  
3 might otherwise be construed to be outside of its scope.  
4

5           5.     The use of the singular form of any word includes the plural and vice  
6 versa.

7           6.     All names with one or more accent marks include those same names  
8 without accent marks and vice versa.  
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**DEPOSITION TOPICS**

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2 1. Whether the Adult Plaintiffs were referred by USBP to the AZ USAO for  
3 prosecution in or around May 2018.

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5 2. The reason or reasons why the AZ USAO did not prosecute Adult  
6 Plaintiffs in or around May 2018.

7 3. All Documents and/or Communications reviewed by the AZ USAO in  
8 connection with the decision not to prosecute each Adult Plaintiff.

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10 4. Any communications between the AZ USAO and USBP regarding or  
11 referring to the Adult Plaintiffs.

12 5. The identity or identities of the person(s) in the AZ USAO who made the  
13 final decision not to prosecute each Adult Plaintiff, the date and time when each  
14 decision was made, and the date and time each decision was communicated to USBP.

15  
16 6. Any policies, practices, procedures, directives, guidelines, or other  
17 instruction provided to anyone within the AZ USAO that impacted or informed the  
18 decision not to prosecute each Adult Plaintiff.

19  
20 7. Any changes or revisions to policies, practices, procedures, directives,  
21 guidelines, or other instruction referenced in ¶ 6 made in May or June 2018.

22 8. Any trainings, directives, guidelines, instructions, complaints and/or  
23 concerns communicated by AZ USAO to the USBP's Yuma Sector personnel between  
24 January 1, 2017, and June 30, 2018, regarding the referral of cases for prosecutions  
25 under 8 U.S.C. § 1325.  
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